

### **Remarks**

Applicants have reviewed the Final Office Action mailed December 1, 2009. Claims 1-5, 7-19, and 22-40 are pending in the application. By this amendment, claims 1, 2, 4, 5, 10, 11, 13-17, 22-24, 26, 30-32, and 34-36 are amended and claims 7-9 and 27-29 are cancelled without prejudice or disclaimer of the subject matter therein. Upon entry of this amendment, claims 1-5, 10-19, 22-26, and 30-40 will be pending. Applicants respectfully submit the following remarks.

#### **CLAIM REJECTIONS UNDER 35 U.S.C. § 112, Second Paragraph**

Claim 8 stands rejected under 35 U.S.C. § 112, second paragraph as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicants regard as the invention. Applicants have cancelled claim 8, without prejudice or disclaimer, and thus submit that the rejection is moot. Applicants respectfully request the Examiner withdraw the rejection.

#### **CLAIM REJECTIONS UNDER 35 U.S.C. § 103(a)**

Claims 1-5, 7-15, 19, 22-36, and 40 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Tabatabai et al. by (US 2003/0110297) (“Tabatabai”) in view of Case (US 2005/0063418) and further in view of Kumagai (US Patent 6,512,722) (“Kumagai”). Claims 16 and 37 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Tabatabai, Case, and Kumagai, and further in view of Soundararajan (US patent 7,355,624). Claims 17, 18, 38, and 39 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Tabatabai and Case, and further in view of Poo et al. (US 2003/0005337) (“Poo”).

Applicants respectfully traverse the rejections because the cited references do not disclose or otherwise suggest all of the limitations of the claims. In addition, Applicants respectfully submit that the Examiner has not provided any other convincing line of reasoning for a finding of obviousness in the absence of the undisclosed limitations.

To properly establish a prima facie case of obviousness, the Examiner must show that the prior art reference, or references when combined, teach or suggest all of the claim limitations. Prior art under 35 U.S.C. §103 is the same as prior art under 35 U.S.C. §102. MPEP § 2141.01. "[T]o support the conclusion that the claimed invention is directed to obvious subject matter, either the references must expressly or impliedly suggest the claimed invention or the examiner must present a convincing line of reasoning as to why the artisan would have found the claimed invention to have been obvious in light of the teachings of the references." *Ex parte Clapp*, 227 USPQ 972, 973 (Bd. Pat. App. & Inter. 1985).

Applicants respectfully traverse the rejection of claim 1 as previously presented because the cited references do not disclose all of the limitations of the claim. However, solely to advance prosecution of this application and obtain the allowance of claims at the earliest possible date, Applicant has amended claim 1 to include a number of additional limitations to further distinguish the claimed invention from the combination of Tabatabai, Case and Kumagai. No admission should be inferred by these amendments, and Applicants reserve the right to prosecute the originally filed claims in future prosecution.

For example, claim 1 has been amended to specify: i) that the portable storage device connector of a first type is a USB male-type connector capable of a direct connection to a USB female-type video system connector of a computer to receive USB protocol video signals; ii) that the interface section connector is a USB female-type connector capable of a direct connection to

the USB male-type connector of the portable storage device; and iii) that the interface section is capable of converting the USB protocol video signals to HDMI protocol signals for transmission to a television. Support for these amendments is found in the published international (PCT) pamphlet at least at page 10, line 18 to page 11, line 1 and at page 11, line 21 to page 12, line 6.

In the Final Office Action, the Examiner has asserted, on the basis of paragraph 44 of Tabatabai, that the network interface (Figure 7: '736') and the USB controller (Figure 7: '720') are equivalent to the interface section of the claim 1. Applicants respectfully disagree and submit that paragraph 44 only discloses the following:

- i) that the original multimedia data is transformed from MP3 format to WAV format;
- ii) that the original multimedia data is down-sampled from 44KHz to 8KHz; and
- iii) that the language of the original multimedia data is changed from English to Japanese.

Therefore, paragraph 44 is totally silent on the original multimedia data being transformed from USB protocol to HDMI protocol.

In addition, Applicants respectfully submit that the entire disclosure of Tabatabai is primarily concerned with the following adaptations of the multimedia data – as illustrated in paragraph 39 and Figure 3:

- i) media transformation (e.g. transforming video data to a series of still frames);
- ii) composition transformation (e.g. transforming SMIL format to HTML format); and
- iii) metadata transformation (e.g. transforming XML standard to MPEG-7 standard).

Therefore, it is clearly seen that none of these transformations relate to adaptation of the multimedia data from the USB protocol to the HDMI protocol.

In contrast with Tabatabai, amended claim 1 requires the interface section to convert the USB protocol signals to HDMI protocol signals. Such protocol signal conversions may involve

decompression of the USB signals into uncompressed HDMI signals for transmission by HDMI connectors. Applicants respectfully submit that a skilled artisan reviewing Tabatabai would not have modified the teaching to arrive at the invention because Tabatabai teaches that the server PC 740 receives multimedia data transmitted on a wide area network such as the internet (see, for example, paragraph 50 and Figure 7), whereas the claimed invention relates an interface section capable of direct connections to a computer and a television.

Similarly, Applicants submit that Case does not disclose any interface section that converts USB protocol video signals to HDMI protocol video signals. Instead, all that Case discloses is a set of digital tuners for wirelessly receiving modulated signals (e.g. digital television signals) and for converting these modulated signals into uncompressed digital/analog video output signals. As the modulated signals are wirelessly received from a terrestrial broadcast antenna and are accordingly decoded by the tuners for playback on a digital device, one skilled in the art reading Case would not have been motivated to modify those tuners to connect to any portable storage device directly via USB-type connectors. Accordingly, the skilled reader would have no incentive to require those tuners to convert USB protocol video signals to HDMI protocol video signals.

Applicants respectfully note that it appears the Examiner has misquoted the ‘interface section’ in the context of this claimed invention for the ‘first video system’ from the second last line at page 5 to line 9 at page 6 of the Final Office Action. Nonetheless, it seems that the Examiner has correctly determined that the server computer 720 of Tabatabai (mistakenly denoted with numerical 740 in Figure 7) is not configured to receive the multimedia data from the local device 770. Indeed, paragraph 55 of Tabatabai clearly teaches that multimedia data are typically broadcast from multimedia sources 710 (e.g. a digital television broadcast) on the

network 750 (e.g. the Internet). The multimedia data is then accordingly adapted by the transformation engine 728 so that the adapted data can be played back on the local device 770.

Accordingly, one of ordinary skill in the art would have understood from the teachings of Tabatabai that the multimedia data is sent uni-directionally from the multimedia source 710 to the local device 770, first via broadcast of the multimedia data from the multimedia source 710 to the network 750 and then via a connection between the server computer 720 and the local device 770. In contrast to the Examiner's position in the second complete paragraph at page 6 of the Final Office Action, even if Case does teach a bi-directional data exchange, the ordinarily skilled artisan would not have incorporated this teaching in Tabatabai to arrive at a bi-directional multimedia data exchange between the server computer 720 and the local device 770 because Tabatabai teaches away from a bi-directional exchange.

Accordingly, Applicants respectfully submit that the Examiner is incorrect in asserting that the network interface 736 and the USB controller 720 of Tabatabai are equivalent to the interface section of claim 1. This is because the network interface 746 and the USB controller 720 do not receive any USB protocol video signals from the local device 770, much less convert such USB protocol video signals to HDMI protocol video signals.

Advantageously, by providing an interface section that is capable of converting USB protocol video signals to HDMI protocol video signals, embodiments of this invention allow their users to view their videos not only on computers but also on televisions. This may thereby enhance the scalability and flexibility of the user's video data. Furthermore, by requiring the interface section to have a USB female-type connector for direct connection to a USB male-type connector of the portable storage device, detachment of the portable storage device and the interface section is permitted. Advantageously the interface section may be permanently coupled

to the television (which receives HDMI protocol video signals) since the user may prefer to watch his video on the television, while the portable storage device may be carried around by the user to download new video from various computers (via USB-type connectors) for subsequent viewing on the television.

In view of the above remarks, Applicants submit that the cited art does not disclose all the limitations of independent claim 1 as amended. Further, Applicants respectfully submit that the Examiner has not provided any other convincing line of reasoning for a finding of obviousness in the absence of the undisclosed limitations. Accordingly, Applicants submit that independent claim 1 is in condition for allowance. Claims 2-5 and 10-19 depend directly or indirectly from claim 1 and thus are believed to be patentable for at least the reasons presented above. Independent claim 22 and claims 23-26 and 30-40 depending therefrom include limitations similar to claim 1, and thus are also believed to be patentable for at least the reasons presented above. In addition, claims 7-9 and 27-29 have been cancelled without prejudice or disclaimer to the subject matter therein, thus rendering their rejections moot. Accordingly, Applicants respectfully request the rejections of claims 1-5, 10-19, 22-26, and 30-40 be withdrawn and the claims allowed.

## CONCLUSION

Applicants submit that this application is in condition for allowance for at least the reasons presented above. Favorable consideration and prompt allowance of the application are respectfully requested. The Commissioner is authorized to charge any deficiencies and credit any overpayments to Deposit Account No. 06-1910. The Examiner is invited to telephone the undersigned if the Examiner believes it would be useful to advance prosecution.

Respectfully submitted,

/John F. Dolan/

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*Please grant any extension of time necessary for entry; charge any fee due to Deposit Account No. 06-1910.*

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